

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

ASSOCIATION OF AMERICAN  
UNIVERSITIES, *et al.*,

Plaintiffs,

v.

DEPARTMENT OF HEALTH & HUMAN  
SERVICES, *et al.*,

Defendants.

Case No. 1:25-cv-10346

**MOTION FOR *PRO HAC VICE* ADMISSION OF PAUL D. CLEMENT**

Now comes Shoba Pillay, a member in good standing of the bar of this Court, and moves pursuant to Local Rule 83.5.3 for the admission in this case of Paul D. Clement as counsel for Plaintiffs, American Universities, American Council on Education, Association of Public and Land-grant Universities, Brandeis University, Brown University, The Regents of the University of California, The California Institute of Technology, Carnegie Mellon University, The University of Chicago, Cornell University, The George Washington University, Johns Hopkins University, Massachusetts Institute of Technology, Trustees of The University of Pennsylvania, University of Rochester, and Trustees of Tufts College.

Mr. Clement is a partner in the law firm of Clement & Murphy, PLLC. He is a member of the bar in good standing in every jurisdiction in which he has been admitted to practice; there are no disciplinary proceedings pending against him as a member of the bar in any jurisdiction; he has not previously had a *pro hac vice* admission to this Court (or other admission for a limited purpose under Local Rule 83.5.3) revoked for misconduct; and he has read and agrees to comply with the Local Rules of the United States District Court for the District of Massachusetts.

**WHEREFORE**, Shoba Pillay requests that Mr. Clement be granted leave to appear and practice *pro hac vice* on behalf of Association of American Universities, American Council on Education, Association of Public and Land-Grant Universities, Brandeis University, Cornell University, Boston University, George Washington University, and Massachusetts Institute of Technology (“MIT”) in the above-captioned matter.

Dated: February 10, 2025

Respectfully submitted,

ASSOCIATION OF AMERICAN UNIVERSITIES,  
AMERICAN COUNCIL ON EDUCATION,  
ASSOCIATION OF PUBLIC AND LAND-GRANT  
UNIVERSITIES, BRANDEIS UNIVERSITY, BROWN  
UNIVERSITY, THE REGENTS OF THE UNIVERSITY  
OF CALIFORNIA, THE CALIFORNIA INSTITUTE OF  
TECHNOLOGY, CARNEGIE MELLON UNIVERSITY,  
THE UNIVERSITY OF CHICAGO, CORNELL  
UNIVERSITY, THE GEORGE WASHINGTON  
UNIVERSITY, JOHNS HOPKINS UNIVERSITY,  
MASSACHUSETTS INSTITUTE OF TECHNOLOGY,  
TRUSTEES OF THE UNIVERSITY OF  
PENNSYLVANIA, UNIVERSITY OF ROCHESTER,  
and TRUSTEES OF TUFTS COLLEGE,

/s/ Shoba Pillay

Shoba Pillay, BBO No. 659739  
353 N Clark Street  
Chicago, IL 60654  
Tel: (312) 222-9350  
SPillay@jenner.com

**LOCAL RULE 7.1 CERTIFICATION**

As of the date of this filing, it is unknown who will represent the defendants in this matter. For that reason, counsel have not had an opportunity to confer in an effort to resolve or narrow the issues presented by this motion.

/s/ Shoba Pillay

Shoba Pillay

**CERTIFICATE OF SERVICE**

I, Shoba Pillay, hereby certify that a true copy of this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on February 10, 2025.

/s/ Shoba Pillay  
Shoba Pillay

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**CERTIFICATION IN SUPPORT OF  
MOTION FOR *PRO HAC VICE* ADMISSION**

Pursuant to Local Rule 83.5.3(e)(3) of the Local Rules of the United States District Court for the District of Massachusetts, I, Paul D. Clement, hereby certify:

1. I submit this certification in support of Defendants' Motion for *Pro Hac* Admission.
2. I am a partner in the law firm of Clement & Murphy, PLLC and a member of the bars of Virginia, the District of Columbia, Wisconsin, the U.S. Supreme Court, every federal court of appeals, the U.S. Court of Federal Claims, the U.S. District Court for the District of Columbia, and the U.S. District Court for the Northern District of Florida.
3. I am a member of the bar in good standing in every jurisdiction in which I have been admitted to practice.
4. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.

5. I have not previously had a *pro hac vice* admission to this Court (or other admission for a limited purpose under Local Rule 83.5.3) revoked for misconduct. I have read and agree to comply with the Local Rules of the United States District Court for the District of Massachusetts.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 10, 2025

/s/Paul D. Clement

Paul D. Clement (VA Bar # 37915)

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